

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS**

BUREAU OF CONSUMER FINANCIAL  
PROTECTION,

Plaintiff,

v.

TOWNSTONE FINANCIAL, INC., AND  
BARRY STURNER,

Defendants.

Case No. 1:20-cv-04176

Judge Franklin U. Valderrama  
Magistrate Judge Gabriel A. Fuentes

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE  
DEFENDANTS' RESPONSIVE PLEADING OR MOTION UNDER RULE 12  
OF THE FEDERAL RULES OF CIVIL PROCEDURE**

Defendants Townstone Financial and Barry Sturner (collectively, Defendants), by and through their counsel, respectfully request this Court grant them a 60-day extension of time to file a responsive pleading or motion pursuant to Federal Rule of Civil Procedure 12 to and including November 18, 2024. As a result of the mandate issued by the United States Court of Appeals for the Seventh Circuit on September 3, 2024, Dkt. Nos. 121–22, remanding this case to this Court, the current deadline for Defendants to file a responsive pleading or motion is September 17, 2024. Plaintiff Consumer Financial Protection Bureau (Bureau) does not object.

This Court should grant the request to give Defendants additional time to consider whether to file another motion to dismiss or an answer under Rule 12 and to do so in connection with the parties' discussions concerning the Court's order on September 6, 2024, directing the parties to confer and file a joint status report by September 19, 2024. Dkt. No. 123. The parties were already engaged in discussions

concerning next steps in the case, and they will file a joint status report concerning their positions on next steps by September 19. An extension of time to file a motion or responsive pleading after the parties confer and receive input from the Court serves the interests of judicial economy and avoids wasting the Court's or parties' time with filings which may become redundant or irrelevant.

This is Defendants' first request to extend a deadline following the United States Court of Appeals for the Seventh Circuit's remand to this Court. Defendants avow this request is being made in the interests of judicial economy and not for the purposes of undue delay. Accordingly, the Defendants respectfully request that the Court grant the motion for extension.

DATED: September 11, 2024

Respectfully submitted,

/s/ Steven M. Simpson

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**CERTIFICATE OF SERVICE**

The undersigned hereby certify that on September 11, 2024, I electronically filed the foregoing document with the Clerk of the Court via the CM/ECF system, which will cause a copy to be served upon counsel of record.

/s/ Steven M. Simpson  
STEVEN M. SIMPSON